

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

**In Re: AUTOMOTIVE PARTS ANTITRUST
LITIGATION**

Master File No. 12-md-02311
Honorable Marianne O. Battani

In Re: Wire Harness
In Re: Instrument Panel Clusters
In Re: Heater Control Panels
In Re: Bearings
In Re: Anti-Vibrational Rubber Parts
In Re: Windshield Wipers
In Re: Radiators
In Re: Starters
In Re: Automotive Lamps
In Re: Ignition Coils
In Re: HID Ballasts
In Re: Electronic Powered Steering Assemblies
In Re: Fan Motors
In Re: Fuel Injection Systems
In Re: Power Window Motors
In Re: Automatic Transmission Fluid Warmers
In Re: Air Conditioning Systems
In Re: Windshield Washer Systems
In Re: Spark Plugs
In Re: Shock Absorbers
In Re: Body Sealing Products
In Re: Interior Trim Products
In Re: Automotive Brake Hoses
In Re: Exhaust Systems
In Re: Ceramic Substrates
In Re: Automotive Steel Tubes
In Re: Access Mechanisms
In Re: Door Latches

Case No. 2:12-cv-00103
Case No. 2:12-cv-00203
Case No. 2:12-cv-00403
Case No. 2:12-cv-00503
Case No. 2:13-cv-00803
Case No. 2:13-cv-00903
Case No. 2:13-cv-01003
Case No. 2:13-cv-01103
Case No. 2:13-cv-01203
Case No. 2:13-cv-01403
Case No. 2:13-cv-01703
Case No. 2:13-cv-01903
Case No. 2:13-cv-02103
Case No. 2:13-cv-02203
Case No. 2:13-cv-02303
Case No. 2:13-cv-02403
Case No. 2:13-cv-02703
Case No. 2:13-cv-02803
Case No. 2:15-cv-03003
Case No. 2:15-cv-03303
Case No. 2:16-cv-03403
Case No. 2:16-cv-03503
Case No. 2:16-cv-03603
Case No. 2:16-cv-03703
Case No. 2:16-cv-03803
Case No. 2:16-cv-04003
Case No. 2:16-cv-04103
Case No. 2:17-cv-11637

THIS DOCUMENT RELATES TO:

END PAYOR ACTIONS

**GEICO'S UPDATED STATEMENT OF CONFERRAL RE ITS MOTION TO INTERVENE
AND STAY FINAL FAIRNESS DETERMINATION – *EXPEDITED TREATMENT*
*REQUESTED***

PLEASE TAKE NOTICE that GEICO Corporation, Government Employees Insurance Co., GEICO General Insurance Co., GEICO Indemnity Co., GEICO Casualty Co., GEICO Advantage Insurance Co., GEICO Choice Insurance Co., GEICO Secure Insurance Co., GEICO County Mutual Insurance Co. (collectively, “GEICO”), by their counsel listed below, respectfully submit this Updated Statement of Conferral regarding its Motion to Intervene and Stay Final Fairness Determination – Expedited Treatment Requested (“Motion”).

As required by Local Rule 7.1(a), counsel for GEICO emailed counsel for the Round 3 Settling Defendants¹ and Settlement Class Counsel shortly before filing the instant motion on August 14, 2018 to confer. Counsel for the Round 3 Settling Defendants and Settlement Class Counsel indicated they would be available for conferral call on Wednesday or Thursday. Given GEICO’s interests at stake, GEICO believed it necessary to file this Motion as soon as

¹ The Round 3 Settling Defendants include: Aisan Industry Co., Ltd.; Aisan Corporation of America; Franklin Precision Industry, Inc.; Hyundam Industrial Co., Ltd.; ALPHA Corporation; Alpha Technology Corporation; Alps Electric Co., Ltd.; Alps Electric (North America), Inc.; Alps Automotive, Inc.; Robert Bosch GmbH; Robert Bosch LLC; Bridgestone Corporation; Bridgestone APM Company; Calsonic Kansei Corporation; CalsonicKansei North America, Inc.; Chiyoda Manufacturing Corporation; Chiyoda USA Corporation; Continental Automotive Systems, Inc.; Continental Automotive Electronics, LLC; Continental Automotive Korea Ltd.; Diamond Electric Mfg. Co., Ltd.; Diamond Electric Mfg. Corp.; Eberspächer Exhaust Technology GmbH & Co. KG; Eberspächer North America, Inc.; MAHLE Behr GmbH & Co. KG; MAHLE Behr USA Inc.; Faurecia Abgastechnik GmbH; Faurecia Systèmes d’Échappement; Faurecia Emissions Control Technologies, USA, LLC; Faurecia Emissions Control Systems, N.A., LLC; Hitachi Automotive Systems, Ltd.; Hitachi Metals, Ltd.; Hitachi Cable America Inc.; Hitachi Metals America, Ltd.; INOAC Corporation; INOAC Group North America, LLC; INOAC USA Inc.; JTEKT Corporation; JTEKT Automotive North America, Inc.; JTEKT North America Corp., formerly d/b/a Koyo Corporation of U.S.A.; MITSUBA Corporation; American Mitsuba Corporation; Nachi-Fujikoshi Corp.; Nachi America Inc.; NGK Insulators, Ltd.; NGK Automotive Ceramics USA, Inc.; NGK Spark Plug Co., Ltd.; NGK Spark Plugs (U.S.A.), Inc.; Nishikawa Rubber Co. Ltd.; Sanden Automotive Components Corp.; Sanden Automotive Climate Systems Corp.; Sanden International (USA), Inc.; SKF USA Inc.; Stanley Electric Co., Ltd.; Stanley Electric U.S. Co., Inc.; and II Stanley Co., Inc.; Tenneco Inc.; Tenneco Automotive Operating Co., Inc.; Tenneco GmbH; Toyo Tire & Rubber Co., Ltd.; Toyo Automotive Parts (USA), Inc.; Toyo Tire North America OE Sales LLC; Usui Kokusai Sangyo Kaisha, Ltd.; Usui International Corporation; Valeo S.A.; Yamada Manufacturing Co., Ltd.; Yamada North America, Inc.; and Yamashita Rubber Co., Ltd.; and YUSA Corporation.

practicable and conveyed this to counsel. Accordingly, GEICO filed its Motion in the above-captioned matters between August 14, 2018 and August 15, 2018. Following, counsel for GEICO participated in a substantive telephonic conferral call with counsel for the majority of Round 3 Settling Defendants and Settlement Class Counsel. Counsel for GEICO and counsel for the Settlement Class and the Round 3 Settling Defendants on the call were unable to come to an agreement on the issues presented in GEICO's Motion.

Dated: August 16, 2018

Respectfully submitted,

LEWIS ROCA ROTHGERBER CHRISTIE LLP:

s/ Dan Goldfine

Dan Goldfine (Adm ED MI, AZ Bar 018788)
dgoldfine@lrrc.com
201 East Washington St.
Suite 1200
Phoenix, AZ 85004
602-262-5392

Frederick J. Baumann (Adm ED MI, CO Bar 12156)
fbaumann@lrrc.com
Diane R. Hazel (Adm ED MI, CO Bar 42954)
dhazel@lrrc.com
1200 17th Street
Suite 3000
Denver, CO 80202

Attorneys for Plaintiffs

MYERS & MYERS, PLLC:

/s Kelly A. Myers

Kelly A. Myers (P49143)
kmyers@myers2law.com
Rebecca J. Cassell (P64456)
rcassell@myers2law.com
915 N. Michigan Avenue
Howell, MI 48843
(517) 540-1700

Local Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this the 16th day of August, 2018, I caused a true and correct copy of the foregoing Motion to Intervene and Stay Final Fairness Determination to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ Dan Goldfine

Dan Goldfine
201 East Washington St.
Suite 1200
Phoenix, AZ 85004
602-262-5392